IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DePuy Mitek, Inc. **a Massachusetts Corporation** **Plaintiff,** **v.** **Arthrex, Inc.** **a Delaware Corporation and** **Pearsalls Ltd.** **a Private Limited Company** **of the United Kingdom** **Defendants.**	)	**Civil No. 04-12457 PBS**

UNOPPOSED MOTION TO FILE SUBSTITUTE EXHIBIT TO DEPUY MITEK'S MEMORANDUM IN OPPOSITION TO ARTHREX'S MOTION FOR SUMMARY JUDGMENT

Plaintiff DePuy Mitek, Inc. ("Mitek") discovered a minor error in connection with one exhibit cited in its memorandum in opposition to Defendants Arthrex, Inc.'s and Pearsalls' Ltd motion for summary judgment filed on September 1, 2006. Exhibit 6 cited in plaintiff's memorandum in opposition to Arthrex's motion for summary judgment, is incomplete in that it is missing pages 217-219 of Dr. Mukherjee's deposition testimony. Mitek seeks leave to file a substitute exhibit 6 that includes pages 217-219 of that testimony.

In accordance with Local Rule 7.1(a)(2), counsel for plaintiff certifies that they conferred with counsel for defendants regarding the above-identified correction on September 27, 2006 and counsel for defendants do not oppose this motion.

Accordingly, Mitek moves the Court for an Order granting leave to file the above identified substitute exhibit attached hereto.

Respectfully submitted,

Dated: September 27, 2006

DEPUY MITEK, INC.,
By its attorneys,

/s/ Erich M. Falke

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CERTIFICATE OF SERVICE

I certify that I am counsel for DePuy Mitek, Inc. and that true and correct copies of:

UNOPPOSED MOTION TO FILE SUBSTITUTE EXHIBIT TO DEPUY MITEK'S MEMORANDUM IN OPPOSITION TO ARTHREX'S MOTION FOR SUMMARY JUDGMENT

were served on counsel for Defendants Arthrex, Inc. and Pearsalls Ltd. on this date via the Court's e-mail notification with the following recipients being listed as filing users for Defendants:

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Dated: September 27, 2006

/s/ Erich M. Falke
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MITEK'S SUBSTITUTE EXHIBIT 6

(in support of DePuy Mitek's Memorandum in Opposition to Arthrex's Motion for Summary Judgment)

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MASSACHUSETTS

DEPUY MITEK, INC., a Massachusetts corporation, Plaintiff,	)	Civil Action
vs.	)	04-12457 PBS
ARTHREX, INC., a Delaware corporation, Defendant.	)	

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The deposition of DEBI PRASAD MUKHERJEE was taken on Tuesday, June 13, 2006, commencing at 9:08 a.m., at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, N.W., Washington, D.C., before Susanne Bergling, Registered Merit Reporter and Notary Public.

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Q. Okay. Do you understand this is the prosecution history of a -- of an Arthrex patent, right?
A. Yes, that's what it says.
Q. Okay. If you would turn to DMI 41091.
A. 41091, yes.
Q. Okay. At the top paragraph, do you see it says, "The suture of Example 7 of Chesterfield, et al., '575, uses a Spectra 1000 core surrounded by a hollow sheath --" I'm sorry, "a hollow braided sheath made of a single type of yarn"?
Do you see that?
A. No, where are you, starting in the middle?
Q. Right here. Right here, first paragraph.
A. First paragraph.
Q. This says --
A. Suture Example 7, is that what you're reading from?
Q. Yes, the suture --
A. Okay.
Q. Do you see that?
A. Yes, I see it.
Q. It says, "The suture of Example 7 of Chesterfield, et al., '575, uses a Spectra 1000 core surrounded by a hollow braided sheath made of

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a single type of yarn."
Do you see that?
A. Um-hum.
Q. Do you agree with that statement?
A. Yeah.
Q. Okay. And then if you go down later in the third paragraph --
A. Third paragraph, yeah.
Q. -- it says, the second sentence says, "As noted above, Chesterfield, et al., '575, does not disclose an example of a braided sheath that includes a blend of both -- of both ultra high molecular weight polyethylene and polyester."
Do you see that?
A. Yes.
Q. Do you agree with that statement?
A. Yes.
Q. Okay. When you were referring to the claims of the '575 patent -- I'd like to turn to those now.
A. Are you done with this or --
Q. Yes.
A. Number 4, the '575.
Q. It claims that it's a method for repairing split portions of body tissue. Do you see that?

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A. Yes.
Q. It goes on, it says, "comprising looping a flexible elongated member about the body tissue."
Do you see that?
A. Um-hum.
Q. Okay. What significance do you give to the meaning of going "about" the body tissue? What does that mean?
A. It --
MR. TAMBURO: Objection, vague.
THE WITNESS: "About the body tissue" is kind of funny language. Through the tissue, that's what it normally will do to produce --
BY MR. BONELLA:
Q. You mean going through the tissue?
A. That's what I would think.
Q. Okay.
A. Whether soft or hard, doesn't matter.
Q. Do you think the -- where the claim says "looping a flexible elongated member about the body tissue," do you think that FiberWire is used in going about body tissue as that's used in the claim?
A. You're asking about FiberWire?
Q. Yes.

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MR. TAMBURO: Objection, vague, and he's not an expert on how FiberWire is used in surgery.
THE WITNESS: Again, I may not know what's in surgery, but I have myself used in meniscal repair with a surgeon through the body tissue.
BY MR. BONELLA:
Q. Okay. So, is FiberWire -- to the extent you know, if FiberWire is used in surgery, is it used to go about body tissue?
A. To attach something, yes.
Q. It is? Okay. Would that be a pretty standard understanding?
A. I don't know what is standard. It's new suture, so nobody might not know that it's available. It cannot be standard.
Q. Well, no, not the FiberWire. Are sutures --
A. You asked me for FiberWire first, then you changed --
Q. The use of FiberWire, not the construction, how it's used.
A. Yeah.
Q. FiberWire, is it your understanding that it's normally used to go about body tissue?
MR. TAMBURO: Objection, vague, and he's

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A. Yeah.
Q. And then there's also one from John Schmieding to Steve Soffen? Right here (indicating).
A. Oh, yeah, okay.
Q. December 4th, 2003.
A. Okay.
Q. So, the -- and do you see how it's a discussion of the '688 patent in the email?
A. You're talking about the '688 patent here, yes.
Q. Is discussed, right?
A. Is discussed, yeah.
Q. Okay. So, it's December 4th, 2003.
A. Right.
Q. And then if you go to Exhibit 209, it's December 23rd, 2003.
A. Right.
Q. So, it's a -- so, the Exhibit 209 was about a week and a half after -- or I'm sorry, about -- Exhibit 209 was about three weeks after Exhibit 198.
Do you see that?
A. Okay.
Q. Exhibit 209, if you look at the bottom on

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Exhibit 209 --
A. Yeah.
Q. -- the last paragraph, do you see it's an email from Steve Soffen to John Schmieding?
A. Yeah.
Q. Okay, and the last paragraph says, "An assertion of non-infringement is always more palatable than an assertion of invalidity." Then he says, "Since we have not yet found 'knock-out' prior art, my inclination is to respond to Ethicon with the above if Ethicon provides evidence pre-dating Chesterfield."
Do you see that?
A. Yeah.
Q. Okay. Did you consider, in forming your opinions, that Mr. Soffen had said that he had not yet found knock-out prior art in December of 2003 but at that time was aware of the '688 patent?
A. No, because I don't even know this thing at that time frame, 2003.
Q. You didn't consider that?
A. No, because I -- I didn't get this thing.
Q. Would you like to know why Mr. Soffen didn't think he had found knock-out prior art as of December --

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A. No, I don't -- I don't want to know.
Q. You don't want to know?
A. Yeah.
Q. Okay. And do you see where he also references the Chesterfield patent there?
A. Yes.
Q. But he -- Mr. Soffen said he had not yet found knock-out prior art. Do you see that?
A. He says that, yeah.
Q. Did -- did anyone tell you why Mr. Soffen said he did not find knock-out prior art even though he was aware of the Chesterfield patent?
A. No.
Q. Okay. Would you like to know why?
A. No.
Q. Would it affect your opinion if Arthrex believed that they had not found knock-out prior art even though they were aware of both the Chesterfield patent and the '688 patent?
A. What's the question?
Q. Would it affect your opinions at all if Arthrex believed that it had not found knock-out prior art even though it was aware of the '688 patent and the Chesterfield patent?
A. No.

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Q. It wouldn't?
A. It does not.
Q. Okay. I'd like to talk about braiding for a minute. You're familiar with braiding machines?
A. Yes.
Q. Okay. And you're familiar with the term "sheath" and "core"?
A. Yes.
Q. And a suture or sheath generally goes around a core?
A. Around the core, yes.
Q. Okay. And would you refer to a sheath/core arrangement as a braided construction?
A. Yes.
Q. Okay. And a sheath material -- if the sheath materials are different than the core material --
A. Not necessarily.
Q. No, I didn't say necessarily. I didn't even ask a question.
A. Oh, you didn't ask a question?
Q. Let me ask a question.
If the sheath materials --
A. Yeah.
Q. -- are different -- I'm sorry, if there

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are -- let me rephrase the question.
If there are different materials in the sheath material --
A. Different material in the sheath material?
Q. In the sheath.
A. Okay.
Q. -- and one of the materials in the sheath is the same as the core, would you refer to that or would one of ordinary skill in the art refer to that as a braided construction?
MR. TAMBURO: Objection, vague.
THE WITNESS: Yeah, if they are braided.
BY MR. BONELLA:
Q. Okay. If the sheath material is all one type of material and the core material is another type of material, would one of ordinary skill in the art refer to that as a braided construction?
A. If they are braided, yes.
Q. If the sheath is braided?
A. The sheath is braided to the core, then --
Q. The sheath is braided about the core?
A. Yeah, um-hum.
Q. So, if the sheath is braided about the core and the sheath is all one type of material and the core is all another type of material, would one of

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ordinary skill in the art refer to that as a braided construction?
A. Yeah.
Q. And would one of ordinary skill in the art refer to that as a braided construction between 1988 and 1992?
A. Yes.
Q. In analyzing the prior art, did you consider in your opinions whether the prior art taught one of ordinary skill in the art how to make and use whatever was described in the prior art references without undue experimentation?
MR. TAMBURO: Objection, vague.
THE WITNESS: No, but the idea comes from this prior art, then you improvise or use other means to get there.
BY MR. BONELLA:
Q. I'd like to turn to the Burgess reference.
A. Which -- which report?
Q. It's Exhibit 5, I believe, to your first report.
A. First report, 239.
Q. 239.
A. Okay.
Q. Do you recall the Burgess reference?

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A. Yes.
Q. Okay. Now, the Burgess reference doesn't describe knot strength, right?
A. Except there is a -- some reference here on the page 2 where, very last line, they are saying, "In very cold conditions, such as fishing through holes in ice, water having worked its way into the braid will freeze and impart a brittleness that can lead to breakage."
Now, whether this is straight breakage or loop breakage, it is not clear, but there is some reference there.
Q. Is there any other thing that could potentially be a reference to knot strength in the Burgess reference?
A. No.
Q. And doesn't the Burgess reference describe how to solve that problem by putting a polyurethane coating, the reference you talk about -- the problem about water getting in and breaking, put it -- I'm sorry, let me rephrase that question.
Doesn't the Burgess reference describe how to solve the problem of water getting into the braid and freezing and breaking by putting a

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polyurethane coating on the braid?
A. I think they also talk about two kinds of filaments, high tensile polyurethane thread and another filament being a polyester and a nylon.
Q. Right, but see where it says --
A. It doesn't say --
Q. (Indicating), page 2, it says, "The braid may be coated with a thin, supple and smooth sheath of polyurethane and this may be carried out by a simple immersion process in liquid polyurethane. It will alter the characteristics (such as buoyancy and strength) in a predictable matter, but its main purpose is to prevent saturation of the interstices of the braid. In very cold conditions, such as fishing through holes in ice, water having worked its way into the braid will freeze and impart a brittleness that can lead to breakage."
Do you see that?
A. No, I read it, that it is -- he is talking about in general, buoyancy and strength, they are two properties.
Q. Right.
A. And the -- they say one of the ways -- I don't read this that it solves that problem with

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A. Then polypropylene is twice, polyester is about twice -- I mean polyester -- polyethylene is twice, then -- ultra high molecular weight polyethylene is twice than polypropylene and twice than polyester, so they are probably significantly higher for the ultra high molecular weight polyethylene, knot pull strength.
Q. Do you know if -- does he provide the standard deviation for the knot pull strength?
A. He didn't, but just looking at the figures, I mean, I can say that, looking at 1.35 or 1.44, you have to say that.
Q. Okay. So, he did not provide standard deviation in this chart.
A. Not in this chart.
Q. Now, for the knot configuration four equals one equals one, do you see that?
A. Yes.
Q. The polyethylene failed at 0.35 gigapascals, which is lower than the failure value for the nylon, polypropylene and polyester for the four equals one equals one configuration, right?
A. Yes.
Q. Okay. And that's because the polyethylene slipped, right?

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A. I don't use the word "sucked."
Q. I said "slipped."
A. Slipped, okay. I thought I heard... sorry.
Q. So, the polyethylene failed at the 0.35 gigapascal level for the four equals one equals one configuration because of the polyethylene slipping, right?
A. Right.
Q. Okay. Polyethylene, including ultra high molecular weight polyethylene, is a lubricious material, right?
A. Yes.
Q. Okay.
A. It's also polypropylene -- excuse me.
Q. Sure.
A. Polypropylene is also a lubricious material.
Q. It is?
A. Yes, it is.
Q. Okay. How about nylon or polyester, are they lubricious?
A. Nylon is also -- again, is lubricious.
Q. How about polyester?
A. Polyester will be less.

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Q. And nylon is less lubricious than polypropylene and polyethylene, right?
A. Probably.
Q. Okay. Now, in that chart, do you see how going across there's different knot configurations, two equals two, three equals two equals one, four equals one equals one, four equals four and four equals four equals four?
A. Yes.
Q. So, going from left to right, two equals two to four equals four equals four, the two equals two is a simpler knot than the four equals four equals four, right?
A. It's not simple or complex. It depends on what the surgeon wants to do. So, he can put more knots to make sure, and in general, they do. They will not stop at two by two. They will probably go to four by four by four to make sure it is there, especially ophthalmic use.
Q. Okay. And if you turn to page ARM 25137 --
A. Thirty-seven, yeah.
Q. Okay, of Cohan, the last paragraph of the first column --
A. Yeah.
Q. -- do you see the sentence beginning

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"Although"? The first column --
A. Did you say first column?
Q. First column, last paragraph.
A. Last paragraph.
Q. The sentence beginning, "Although."
A. "Although," yes.
Q. Cohan states, "Although laboratory testing showed that the polyethylene fiber has a somewhat lower knot holding strength with simpler knots than the other three polymers, more complex knots than are commonly used would realize polyethylene's great knot pull strength."
Do you see that?
A. Yes.
Q. Okay. So, Cohan was calling the more -- the additional knot configurations more complex, right?
A. That's what -- if he meant by that.
Q. Well, did you understand that's what he means when you read this reference?
A. Well, I -- I think that normally for a surgeon, they will put as many knots they can to make sure it's secure, and it's nothing complex or simple about it.
Q. Well, if you look at the author, the author

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in the monomer?
A. Yeah -- well, it's not a monomer, in the polymer.
Q. In the polymer?
A. Yeah.
Q. I'm confused. Are you saying that the monomer unit in all types of polyethylene is the same or different?
A. Mostly same, yeah.
Q. Mostly same, okay.
Would one of ordinary skill in the art between 1988 and 1992 think that the term "polyethylene" refers to low-density polyethylene or includes -- should I say includes low-density polyethylene?
A. Yeah, it would.
Q. It would? But not ultra high? Is that your opinion?
A. Ah, they will also include ultra high, because there are different properties, so they will include also ultra high, as well as low-density.
Q. Okay. I'd like to turn to polypropylene as used in the '446 patent, Exhibit 3 to your first report. Do you see the '446 patent?

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A. Yeah.
Q. Exhibit 3?
A. Exhibit 3.
Q. Right.
A. Yeah, I'm at this.
Q. No, Exhibit 3. I'm sorry, that's Exhibit 3. I'm sorry. Yeah, if you would go to column 4, please.
A. Yeah.
Q. Okay. Beginning at line 9 through 32, do you see that?
A. Nine through 32, yeah.
Q. Okay. That paragraph says, "Preferably, the continuous filaments which make up the first and second set of yarns are derived from nonabsorbable polymers."
Do you see that?
A. Yes.
Q. Is ultra high molecular weight polyethylene a nonabsorbable polymer?
A. Yes.
Q. Okay. Then it says, "In a preferred embodiment, the first set of yarns acts as lubricating yarns to improve the pliability, or compliance, and surface lubricity of the

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heterogenous braid."
Do you see that?
A. That is correct.
Q. Ultra high molecular weight is a lubricating yarn, right?
A. Yes.
Q. Okay. Then it says -- further down it says, "Such fiber forming polymers include perfluorinated polymers," and describes some of those, and then it says, "as well as non-perfluorinated polymers," and refers to polyethylene and PE, right?
A. Right.
Q. Okay. Ultra high molecular weight polyethylene came as fibers before 1992, right?
A. Yes.
Q. Okay. Now, do you see where in the end it says, "The preferred polymers for the first set are PTFE, PETFE, FEP, PE and PP"?
Do you see that?
A. Yes.
Q. Okay. That's column 4, lines 28 to 31.
Did you understand that sentence to refer to all types of polypropylene or just certain types of polypropylene?

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MR. TAMBURO: Objection, vague.
THE WITNESS: This is general purpose polyethylene, which it provides the lubricity and as well as pliability and compliance, not ultra high molecular weight polyethylene.
BY MR. BONELLA:
Q. Okay, that wasn't my question. Listen to the question.
Did you understand that sentence to refer to all types of polypropylene?
MR. TAMBURO: Objection, vague.
THE WITNESS: The fiber-forming polypropylene, yes.
BY MR. BONELLA:
Q. All types, okay.
Did you understand -- do you see where it refers to PVDF?
A. Yes.
Q. Did you understand this paragraph to be referring to all types of polyvinylidene fluoride?
A. Yes.
Q. Okay. Do you see where it refers to PTFE in that paragraph?
A. Yes.
Q. Did you understand it to be referring to

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DEPUY MITEK, INC., a Massachusetts Corporation,
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Defendant.

Videotaped Deposition of DEBI PRASAD MUKHERJEE
- VOLUME TWO -
Washington, DC
Wednesday, June 14, 2006

The videotaped deposition of DEBI PRASAD MUKHERJEE, Volume Two, was held on Wednesday, June 14, 2006, commencing at 9:12 a.m., at the offices of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, Northwest, Washington, DC, before Mary Ann Payonk, RDR, Certified Realtime Reporter, Registered Diplomate Reporter and Notary Public.

Q But for known suture materials, the sterilization parameters for ethylene oxide are well-known to one of ordinary skill in the art?
A For the suture that are currently used. But new suture like the ones described '446, there isn't, at least my opinion. One has to run the test to find out if there is or there isn't.
Q Well, sterilization of -- of PET was known, right, in 1988, of PET for fibers for sutures was well-known with ethylene oxide, right?
MR. TAMBURO: Objection, vague.
A Yes.
BY MR. BONELLA:
Q Okay. And sterilization procedures for PTFE were -- with sterile -- with ethylene oxide were well-known in 1988, right?
MR. TAMBURO: Objection, vague.
A It's also known, yes, but it -- it is also known that PTFE properties are affected by gamma radiation.
BY MR. BONELLA:
Q But ethylene oxide was known in 1988 that they are --
A Yes.
Q -- generally substantially not affected?

A Yes.
MR. TAMBURO: Objection, vague.
BY MR. BONELLA:
Q I'd like to turn to your rebuttal report, which is Exhibit 356. Page 18, you talk about the Harpell patents.
A Yes.
Q Did you consider in your analysis whether the Harpell patents disclose a coated suture?
MR. TAMBURO: Take your time to read the report if you need to.
A To best of my recollection, it didn't.
BY MR. BONELLA:
Q Okay. Well, if the Harpell patents did describe coated sutures, would that change your opinion?
A Yeah.
Q Why?
A Because was refer -- I mean, the coating is an issue, whether coating does or does not change properties of this material.
MR. BONELLA: Okay. I'd like to ask you about some other issues. Let's take a quick break. I need to organize myself.
THE VIDEOGRAPHER: You're now going off the video record at 12:01 p.m.
(A recess was taken from 12:02 p.m. through 12:14 p.m.)
THE VIDEOGRAPHER: We're now back on the video record. The time is 12:14 p.m.
BY MR. BONELLA:
Q Dr. Mukherjee, did the three reports that you provided in this case contain all the opinions that you have in this case?
A At this moment, yes.
Q Okay. Have you been asked to develop any other opinions?
A No.
Q Okay. Are you an expert in the area of suture design?
MR. TAMBURO: Objection, vague.
A Yes.
BY MR. BONELLA:
Q And what -- what's your basis for saying that?
A I work in suture industry more than 13 years.
Q Okay. And when -- you stopped working in the suture industry in the '80s?
A '87.

Q Okay. And are you still expert in the area of suture design today?
MR. TAMBURO: Objection, vague.
A Yes.
BY MR. BONELLA:
Q Even though you haven't worked in the industry?
A But I have worked on projects involving sutures in LSU.
Q Okay. Going back to sterilization for a minute, the Cohen reference, remember Cohen?
A Yes.
Q Does Cohen describe how to sterilize the suture that he made?
A Yes, he did.
Q In the -- in the document? So would -- so would --
MR. TAMBURO: If you need to review it, review it.
BY MR. BONELLA:
Q So is that a sterilization for an -- the ultra high molecular weight polyethylene monofilament suture that he described?
A That was one of -- let me look at that.
Q Excuse me?

MR. TAMBURO: Objection, vague.
A Enough information for a scanning microscopy is not very conclusive. They may or may not be.
BY MR. BONELLA:
Q You don't know?
A I don't know.
Q Okay. Does the coating on FiberWire prevent the PET yarns and the PTFE yarns from each providing their individual properties to FiberWire?
MR. TAMBURO: Objection, vague.
THE WITNESS: Now please correct me.
MR. TAMBURO: And -- and -- and -- and --
THE WITNESS: FiberWire does not contain a PTFE.
BY MR. BONELLA:
Q Oh, I'm sorry. Did I misspeak?
A You just said that.
Q I'm sorry.
Does the coating on FiberWire prevent the PET fibers, PET or ultra high molecular weight polyethylene fibers from providing contribution to FiberWire's properties?
MR. TAMBURO: Objection, vague.
A No.

BY MR. BONELLA:
Q Okay. I'd like to go to your first report, invalidity, Exhibit 239. If we go to tab -- tab 9 --
A Tab 9.
Q There's an excerpt from Dr. Steckel's report.
A Right.
Q It's only a -- a one-page excerpt from his laboratory notebook.
A Yes.
Q Okay. Did you select that one page to put in your report out of his entire notebook, or were you given that one page?
A No, I have the entire notebook.
Q Okay. Why'd you pick -- did you consider the remainder of his notebook when -- when you select that individual page to attach to your report?
MR. TAMBURO: Objection. Well, not an objection, but if you need -- to the extent you need to read the context of why you cited this, please do so.
A Because it is very clear that he was talking about difficulties in core popping and braid looseness.

BY MR. BONELLA:
Q Okay. Do you know what samples on that page he was talking about, when -- when they were made?
A Well, according to the lab, his notebook page signed was date of '89 -- I mean '89.
Q Right.
A That's what it says here.
Q Okay. Do you know when those samples were made that are discussed on that page?
A It's February 2, 1989 at the top. That's when the lab entry is.
Q Okay.
A I assume that's when the samples were made.
Q Okay. I'd like you to turn to Exhibit 26 to Exhibit 359, the report of Dr. Matthew Hermes, which contains a larger excerpt of Dr. Steckel's report right here. And if I could draw your attention to page DMI002617, okay?
A Right here.
Q Right here. 17. Okay --
A 1617.
Q Here's an entry on DMI002617 is June 6, 1988?

A That's correct.
Q Okay. And if you look at the next page, shows a chart of samples, composite braid evaluation, braid constructions. Do you see that?
A Yes.
Q Did you consider that, those constructions?
MR. TAMBURO: Take your time, Dr. Mukherjee.
A I believe I did.
BY MR. BONELLA:
Q Okay. CBE15, do you see CBE15 sample?
A Yeah.
Q Do you know what the construction of that sample was?
MR. TAMBURO: Objection, vague.
A Was PTFE, 11049 in the denier and the fiber. This column on these other things are not there.
BY MR. BONELLA:
Q Do you know what the construction of CB15 was?
MR. TAMBURO: Objection, vague.
A If I understood, you are asking the --
BY MR. BONELLA: